Subject: Systemic Malfeasance, Embezzlement, Institutional Capture, Erosion of Freedom of Expression and Government Accountability, and Persistent Ties to Sanctioned PDVSA and Venezuelan Regime Entities in the Dominican Republic under the Abinader Establishment

Santo Domingo, Dominican Republic
Sunday, July 26, 2026

The Honorable Leah Francis Campos
Ambassador of the United States of America to the Dominican Republic
United States Embassy Santo Domingo
Av. República de Colombia #57
Political/Economic Section or Office of the Legal Attaché (as appropriate)

Dear Ambassador Campos:

We write to submit a formal complaint concerning documented senior corruption, fraud, and enduring ties to sanctioned entities. These include PDVSA, ranking figures in the Maduro regime, and Spanish commercial-political interests. Suspicious activities affect two critical Dominican government-owned bodies: Refinería Dominicana de Petróleo S.A. (REFIDOMSA) and Banco de Reservas (Banreservas). They appear to violate U.S. sanctions under Executive Order 13850 (as amended), the 2019 PDVSA sanctions, and related OFAC and FinCEN frameworks. They also undermine regional stability and U.S. national-security interests.

The same circles and drills form part of a broader arrangement of authority under the Abinader establishment. Their methods include institutional capture, selective timing of accountability, narrative manipulation through massive state media spending, and the increasing criminalization of public criticism. The latter occurs through expanded defamation and libel provisions in the new Criminal Code (Law 74-25). What began as civic pressure against former President Danilo Medina has inverted. Delay now occurs where genuine scrutiny is required. Acceleration occurs where discretionary advantage can be secured. Legal and financial instruments raise the cost of dissent while protecting factional interests inside the energy and banking systems of a critical U.S. partner.

Leonardo Aguilera Batista and Samuel Pereyra Rojas each turned the two government-owned entities in which citizen confidence is most critical into instruments of personal enrichment and partisan command. REFIDOMSA and Banco de Reservas sit at the core of the Dominican economy. When serious questions about their stewardship began to surface, President Abinader responded not with investigation but with rotation. One man moved from the refinery to the bank. The other moved from the bank to the refinery. It was a quiet reshuffling designed to keep the same setup intact and the same practices shielded.

All figures cited below are approximate and denominated in U.S. dollars, unless a different currency is expressly indicated.

Section I: Systematic Looting and Misappropriation at REFIDOMSA: Embezzlement, Nepotism, Cronyism, and Illicit Ties to Sanctioned PDVSA under Leonardo Aguilera Batista (2020–2025)

Leonardo Aguilera Batista was appointed by President Luis Abinader as Executive President of Banco de Reservas in August 2025. From August 2020 until then he served as Chairman of the Board of REFIDOMSA, the Dominican Republic's sole government-owned oil refinery and a de facto monopoly holder in the refined petroleum products market.

Throughout his five-year term, Aguilera cultivated a devoted circle through extensive nepotism and cronyism. He installed family members and close allies in key posts and recruited ranking

executives who owed him personal loyalty. Operating with minimal scrutiny, this grouping systematically diverted state resources through fraud, embezzlement, collusion, bribery, and abuse of office.

The origins of these issues date to 2010, when PDVSA acquired a 49 percent stake in REFIDOMSA pursuant to an agreement negotiated during the Hugo Chávez administration. That arrangement conferred upon PDVSA operational influence, board representation, and a share of profits.

In 2021 Aguilera persuaded President Abinader that repurchasing PDVSA's share was necessary to restore full sovereign command. To evade U.S. sanctions, the transaction was executed through a British Virgin Islands shell company controlled by a trusted intermediary. At the time REFIDOMSA owed PDVSA more than $100 million, and the Maduro government faced severe U.S. financial restrictions, leaving it in urgent need of hard currency. The deal was structured by Grupo Rizek as a deeply discounted bond-for-shares swap that valued PDVSA's portion significantly below market levels.

Concurrently with this transaction, Grupo Petromóvil—a company owned by Grupo Rizek and controlled by Alfredo Acebal Rizek, José Antonio Acebal Rizek, and José Antonio Alfredo Acebal Doorly—experienced exponential growth. A similar expansion occurred with Constructora Rizek under the leadership of Raúl and Salomón Rizek, as well as in the group's asphalt materials business centered on AC-30 bitumen. Grupo Rizek also wields full command over the oil derivatives that enter the country through the port terminal in Punta Torrecilla.

Grupo Rizek commands a significant presence in the hydrocarbons sector, conducts extensive trade with REFIDOMSA through its subsidiaries, and structured the PDVSA operation by utilizing a shell company owned by Patricia Acebal Doorly, sister of José Acebal Doorly, named PATSA, Ltd. These overlapping commercial interests and the family's direct role in structuring the transaction give rise to clear conflicts of interest. The details of the share repurchase are set forth in official records published by the Dominican Ministry of Finance (https://www.hacienda.gob.do/wp-content/uploads/2023/12/Recompra-Acciones-PDVSA.pdf).

PDVSA was then led by Asdrúbal Chávez and Rander Ismael Peña Ramírez, sanctioned Maduro loyalists who remain bound by U.S. enforcement actions, including those related to the Maikelys Espinoza case.

Shortly after the transaction closed, Aguilera engaged two former ranking PDVSA executives, Ramón Aníbal Uzcátegui and Rafael Antonio Chirinos Meléndez, as highly compensated consultants paid in U.S. dollars. Whether this hiring was a condition of the PDVSA agreement is unknown; however, the timing raises weighty concerns.

Aguilera promptly restructured the board and appointed Miguel Vásquez Escoto as Vice President. Miguel Vásquez Escoto is a convicted felon who served prison time for defrauding Chinese nationals in a case involving human-trafficking accusations. He had previously served as Director General of Migration and continues to appear in photographs with a ranking military officer implicated in the same scandal. The Supreme Court of Justice absolved him in 2007 after the complainants desisted and the former Attorney General Radhamés Jiménez withdrew the accusation.

Miguel Vásquez Escoto immediately installed his son, César Miguel Vásquez Camacho, in a senior post with total annual compensation exceeding $180,000 (including a company vehicle and benefits)—more than fifty-five times the Dominican minimum wage of $250 per month. He also secured a board seat and substantial compensation for the brother-in-law of his other son, Manuel III Hazoury Senior.

Nepotism and abuse of power extended further into his family. One of his older sons, Miguel Vásquez Peña, was handed the post of Dominican Consul General in Madrid, Spain by Decree 505-22, serving from September 2022 until Decree 390-24 of July 17, 2024 transferred him to the Dominican Consulate in Milan, Italy. He had earlier been appointed director of the Presidency's Office of Social Management by Decree 684-21 of October 30, 2021.

Ana Elizabeth Pou de Castro was elevated to Executive Administrative Manager of REFIDOMSA, effectively exercising CEO-level authority, while the nominal CEO, Yamily Alina López Souri, was relegated to minor public-relations responsibilities. Pou de Castro promoted her assistant, Ruth Rosario, to Head of Human Resources and exercised near-total command over HR, procurement, IT, and the company vehicle fleet.

By 2025 Pou de Castro was receiving $24,000 per month in salary. She also obtained numerous annual bonuses and supplemental payments, personal use of at least ten company luxury vehicles (several of which were subsequently transferred to her), and broad discretionary spending authority. Between 2020 and 2024 she charged $290,366.98 to company accounts at Supermercados Amigo, CCN, Grupo Ramos, PriceSmart, and Plaza Lama. Upon her departure she received an improper severance package of approximately $3 million, in violation of Dominican labor law.

Pou de Castro put her 21-year-old daughter, Alejandra Salgado Pou (a recent graduate), in a post collecting $4,500 per month. Within three months the daughter received two rapid promotions after her mother created a vacancy and restructured an entire department. The daughter was assigned a company Ford Edge (license plate G517975) and a military driver.

On April 26, 2024, Leonardo Aguilera, Ana Pou de Castro, and José Radhamés Santana traveled to Colombia to meet with Ricardo Roa Barragán (then President of Ecopetrol and former campaign manager for Gustavo Petro) and members of his team. Roa remains the subject of multiple active criminal investigations.

A previous administration had awarded a $62 million contract to the Swiss firm Geogas Trading S.A. for the construction of four 60,000-barrel LP-gas storage spheres and an associated terminal. Aguilera cancelled this contract, secured financing from Banco de Reservas, and through successive amendments increased the total cost by more than 50 percent. Subsequently he eliminated the terminal component and drove overall expenditure above $90 million. This created his first major documented financial linkage to Samuel Pereyra Rojas, then Executive President of Banco de Reservas.

Fundación REFIDOMSA functioned as Aguilera's personal partisan instrument. Unspent budgets and construction allocations were diverted without explanation. Director Franklin Soriano Cabrera received $200,000 per year, even though the foundation operated essentially as a division subject to Aguilera's personal approval for significant disbursements. Assets were channeled to newly created entities such as Formas Atlánticas SRL (whose invoice numbering began at 1) and to manipulated bidding processes that displaced lower-cost providers with significantly more expensive ones (for example, replacing Transporte Emmanuel with Dilo Group).

Leonardo Aguilera maintains a close personal friendship with the current Minister of Public Works, Eduardo Estrella. To secure Estrella's favor, Aguilera placed Estrella's protégé, Renato Nuñez, as Manager of Plant Maintenance and Shutdown despite Nuñez having no relevant experience whatsoever in the field. Unable to find a suitable opening, Aguilera dissolved the company's Technical Directorate and created two new management posts in its place, one tailored for his ally and another for Operations and Technical Services.

More than $5 million was paid to XBYTE for IT services and over $2 million annually to an overpriced cafeteria provider, all without competitive bidding, in violation of Law 340-06. Managerial discretionary spending alone exceeded $4 million on supermarkets, liquor, appliances, restaurants, and luxury goods. None of these outlays were audited or compliant with Law 340-06. Both Aguilera and Pou de Castro personally approved these disbursements.

Aguilera's nephew, Ramón Gabriel Aguilera Quezada (head of the National Asphalt Producers Association), obtained multimillion-dollar state contracts through Constructora Aguilera Quezada, including $400,000 in non-competitive remodeling work at REFIDOMSA.

Both Leonardo Aguilera and his nephew keep strong bonds with Deligne Ascención Burgos, who served as Minister of Public Works from 2020 to 2025. Ascención Burgos was widely criticized for ineptitude, for the politicization and deterioration of the ministry, and for purported misappropriation of assets during his tenure. His son, Deligne Alberto Ascención Vásquez, was designated at the age of 24 as director of purchasing and contracting at the Government Office of Information and Communication Technologies (OGTIC). On August 9, 2026, Deligne Ascención Burgos is set to be chosen as interim president of the ruling PRM party.

Aguilera also promoted his own secretary, Alieska María Díaz García, to coordinator with an annual compensation of $9,336. The post included a brand-new Mercedes-Benz vehicle and a driver paid from state resources. Standard benefits further increased the total package. She was frequently seen at concerts and on trips financed by institutional resources.

Alieska María Díaz García next installed her cousin, Marling Paola García Agramonte, as coordinator of purchasing, contracting, and warehouse. That post carried annual compensation exceeding $200,000, together with vehicles and multiple additional benefits. After the leadership rotation, Leonardo Aguilera raised Alieska to Executive Vice President of Banco de Reservas, a rank far above the one she already occupied. He also made certain that Marling retained her post under the new leadership at REFIDOMSA.

To complete the family circle around Leonardo Aguilera, his sister-in-law María Teresa Quijano Parra appeared as the nominal secretary of the board of directors. She received a monthly salary of $5,431.88.

Fictitious posts and newly created vacancies filled by individuals linked to nepotism and partisan quotas emerged early under Aguilera's chairmanship. By any ordinary standard of management such an arrangement would have been unthinkable. Rank-and-file employees reported that they never saw these individuals who collected salaries without performing any visible work. Examples include Marlene Scarlet Martínez Paulino, who was listed since December 2020 as head of the development of norms and regulations with a salary of $5,634.15, and Iván Oscar Salcedo Cruz, who was designated as economic analyst (a function that did not exist in the company) at a salary of $6,390.35. The Administrative Manager endorsed these decisions.

The list of no-show jobs continued. Luis Augusto Caminero Arzeno held the title of coordinator of business intelligence with a monthly salary of $7,014.47 and performed no verifiable work. Paúl Ramón Rojas Duluc received $6,473.63 each month under the title of document control and monitoring, a function already covered by the quality and document management department. Some of these individuals remain on REFIDOMSA's payroll to this day.

Communications Coordinator Héctor Romero Henríquez received substantial salaries and directed thousands of dollars to his own firms (Mission Films SRL) for image-enhancing and reputation-management campaigns. He subsequently followed Aguilera to Banco de Reservas.

By way of illustration, the main actions linked to former CEO Yamily Alina López Souri during this period included image-consultant talks for employees and the awarding of a nearly 100,000-dollar contract to GreEnergy, the company owned by her close friend Yomayra Martinó, which provided greenwashing services at the oil refinery. She also organized a birthday photo session at the plant without proper safety measures and replaced her assigned vehicle, valued at 150,000 dollars, with a significantly more luxurious model costing approximately 50 percent more.

Recordings show that Yamily stated in bidding committee meetings that competitive offers should be rejected because they came from businessmen linked to the opposition PLD party. All of these events occurred amid the widespread uncertainty, fear, and national lockdown caused by the SARS-CoV-2 pandemic. Prudent spending and sensible resource management were never priorities for this group of functionaries.

In 2023 and 2024, rumors intensified that Aguilera was positioning himself to succeed Pereyra at Banco de Reservas, a $20 billion institution representing almost 40 percent of the country's banking sector. On December 17, 2024, he staged a rushed, incomplete inauguration of the LP-gas spheres, inviting President Abinader despite contractors' projections of a two-year delay.

Prior to his anticipated departure, Aguilera embedded loyalists with substantial salary increases. For instance, José Radhamés Santana's compensation rose from $20,000 in 2020 to more than $160,000 in 2025, exclusive of perks.

Law 200-04 requires government-owned companies to publish payrolls, budgets, financial statements, procurements, expenses, and revenues online. Aguilera's team never complied and actively obstructed access requests. Pou de Castro upgraded IT procedures to encrypt data, restrict access, monitor employee computers, prohibit personal devices, and conduct daily searches of personal belongings.

Internal financial statements for 2020 through 2024 (still non-public) reveal substantial unexplained increases in travel, representation expenses, variable compensation, event costs, extraordinary remunerations, advertising, food, and luxury-vehicle acquisitions.

On August 17, 2025, Presidential Decree 461-25 named Leonardo Aguilera, former Chairman of the Board of REFIDOMSA, to the highest executive post at Banco de Reservas, the Dominican Republic's flagship government-owned bank. Within days, a wave of documented leaks and formal denunciations circulated across social media, exposing serious reported irregularities and abuses committed during Aguilera's incumbency at the government-owned refinery.

Notwithstanding the gravity and specificity of these accusations, the Public Ministry initiated no investigation, and the designation process at Banco de Reservas surged with extraordinary speed and without interruption.

Leonardo Aguilera did not arrive alone. A substantial contingent of REFIDOMSA ranking executives accompanied him to the bank, including Ana Elizabeth Pou de Castro, Alieska Díaz, Amelia Valverde, Héctor Romero, Ruth Rosario, Yamily Alina López Souri, Franklin Soriano, and several other high-ranking functionaries directly implicated in the reported misconduct at the refinery.

In a particularly controversial move, Leandro José Villanueva Acebal—nephew of the intermediary who originally brokered the PDVSA-REFIDOMSA agreement—was appointed Vice President of Grupo Reservas despite clearly failing to meet the legal and professional

qualifications required for such a sensitive financial post. He was later named Executive Vice President of AFI Reservas.

Concurrently, the Dominican government nominated him to serve as the country's representative to the United Nations Office on Drugs and Crime (UNODC) in Vienna. On November 24, 2025, just over three months after these events began, Villanueva Acebal was officially confirmed as the new Permanent Representative of the Dominican Republic to UNODC. He previously served as Director General of DIGEMAPS at the Ministry of Health.

To date, no official explanation has been provided as to whether Villanueva Acebal will retain his well-remunerated executive post at Banco de Reservas while simultaneously occupying this prestigious international diplomatic position.

These developments form part of a broader structure of relationships and placements surrounding Leonardo Aguilera and his associates. It is a matter of public knowledge that in recent weeks Andrés Van Der Horst stepped down as Director of Fiduciaria Reservas, a subsidiary of Grupo Reservas. The official personally posted on X (formerly Twitter) a photograph of himself with Carolina Mejía Gómez, accompanied by a message of support for her presidential candidacy on behalf of the ruling party. He has been replaced by Angelina Biviana Riveiro Disla, who belongs to the inner faction of presidential aspirant Miguel David Collado Morales. Both Leonardo Aguilera and Leandro Villanueva, as well as Riveiro Disla, form part of Collado's support apparatus.

One of Aguilera's sons, known as Leíto and a former deputy for Santiago de los Caballeros, serves as the bid coordinator for David Collado in that province and has publicly announced this role on his Instagram profile. His wife, Ruth Esther Arias Bautista, was elevated to the newly created post of Occupational Health Coordinator at REFIDOMSA, a role that did not previously exist and appears to have been established specifically to accommodate her. She receives a monthly salary exceeding $7,000, in addition to a luxury vehicle and tens of thousands of dollars in annual bonuses. To facilitate her placement, Ana Pou and Leonardo Aguilera removed Dr. Carmen Iris Delgado, who had served full-time in the position for approximately twenty years with an impeccable record. Ruth Arias currently attends the office only on Tuesdays and Fridays, as she resides in Santiago de los Caballeros.

Brigadier General Enrique Armando Aguilera Trujillo is the eldest son of Leonardo Aguilera Batista. In September 2024 he was designated by the Minister of Defense as Director of Intelligence (J2) of the National Army. The J2 has performed functions that are at minimum opaque and appear to serve partisan interests. His designation creates a substantial conflict of interest when considered together with the role of his brother, Leonardo Alfonso Aguilera, who serves as the principal leader and coordinator of David Collado's presidential run in Santiago, and that of his father, Leonardo Aguilera Batista, who heads Banco de Reservas, the country's largest financial institution by asset volume.

These placements illustrate an arrangement in which factors such as nepotism, influence peddling, and undue interference appear to have played a significant role.

Section II: Samuel Pereyra Rojas' Unlawful Enterprise – Partisan Financing, Family Self-Dealing, and Institutional Abuse

Before leaving Banco de Reservas, Samuel Pereyra Rojas squandered 40 million Dominican pesos of the bank's revenue on a self-promotional propaganda campaign to polish his personal image and institutional record. The project was abruptly cut short by his departure sooner than it could air, reduced to nothing more than a farewell video. This was typical of his habit of extravagant, unaccountable spending of Dominican taxpayers' money without scrutiny or

restraint. He brazenly styled himself as the president's favorite banker, though the basis for this claim remains unknown.

Leonardo Aguilera serves as President Abinader's personal pollster. Their friendship dates to the era of the president's father's political career. Pereyra, by contrast, has been aligned with former President Hipólito Mejía's partisan sector and retains connections to certain PRM business interests.

According to his 2020 sworn financial declaration, Samuel Pereyra Rojas held around $250,000 in bank accounts at Bank of America and more than $2,000,000 in certificates issued by Sun Tropic Development, Inc. Virtually no public information is available online regarding the latter entity. The current value of his financial assets in the United States remains unknown.

Pereyra's self-dealing centered on a core of family members and confidants. His cousins Víctor José Rojas de Jesús (Executive Vice President of Seguros Banreservas, removed amid scandals in August 2024) and José Roberto Rosario Rojas reportedly received laundered assets through entities such as Roghe Ingeniería y Servicios SRL. The more than $200 million headquarters project of Grupo Reservas overseen by Víctor José Rojas involved questionable expenditures, including a $2 million property in Cap Cana, luxury apartments in Santo Domingo, and over $1 million in furnishings.

Former Financial Director Rafael Augusto Cabrera Betances used his ownership interest in a well-known Santo Domingo restaurant to divert assets from Banco de Reservas. Bank resources covered private meetings with politicians and business leaders held in the restaurant's private room, as well as luxury services, catering for local and international events, and private dinners. He is currently establishing another restaurant in the Park Place building of Grupo GHR, using capital that appears to derive from these operations during his tenure at the bank. Cabrera Betances continues to collaborate closely with Samuel Pereyra on financial matters at REFIDOMSA.

Former Senior Executive Vice President José Manuel Almonte Rodríguez authorized millions of dollars for FITUR presentations in Madrid and for the opening of Banreservas branches in Miami, New York, and Madrid. He is a frequent visitor to the restaurant associated with Cabrera Betances, where he regularly meets with Samuel Pereyra and members of his inner circle under private arrangements that restrict access and observation.

Luis Ricardo Miñoso Rojas allegedly carried out illicit tasks, including bribing politicians, issuing below-market loans, and awarding substantial advertising contracts to friendly media outlets. In 2023 and 2024 he delivered assets to Pereyra-backed candidates, among them Liz Adriana Mieses Díaz, Giancarlo Aramis Vega Paulino, María Laura Báez Gracesqui, and Carolina Mejía Gómez, daughter of former President Hipólito Mejía.

On May 18, 2024, the eve of the elections, Luis Miñoso Rojas, together with Juan Garrigó Mejía (Carolina's eldest son), distributed bank-secured cash bags to purchase votes in low-income neighborhoods. Juan Garrigó remained until midnight drinking and conversing with the team assisting Liz Mieses's candidacy. We are in possession of an Excel file containing the complete list of recipients and the exact amounts lavished that night.

Luis Miñoso Rojas now heads public relations and communications at REFIDOMSA and continues to serve as a key operative for Samuel Pereyra Rojas in partisan proselytism and related electoral work. From this government-owned company they are devoting significant institutional resources to building and boosting the public profile of Juan Garrigó Mejía as the next mayor of the National District (Santo Domingo) for the 2028-2032 electoral period, at the

same time that his mother, Carolina Mejía Gómez, positions herself for a presidential or vice-presidential run.

Hilda Luisina Miñoso Rojas (sister of Luis Ricardo Miñoso Rojas and cousin of Samuel Pereyra Rojas), her husband Luis Mejía (a member of the board of Seguros Reservas), and Israel González were in charge of several partisan proselytism movements supporting PRM candidacies aligned with Carolina Mejía Gómez for the 2024 elections. Each of these movements received substantial assets diverted by Samuel Pereyra Rojas and his associates. Among these movements are Rodando con Luis (now rebranded as Rodando con la Comunidad with a shift toward Carolina Mejía Gómez's eventual presidential candidacy), Más Luis 2024, Más Carolina 2028, Suma RD, and others.

Hilda Luisina Miñoso Rojas is listed on the payroll of the Ministry of Environment and Natural Resources as the official responsible for sustainable production and consumption. No public record shows that she carries out a genuine operational role or holds the qualifications necessary for the post.

Numerous meetings were held at the Granier bakery (formerly La Francesa), located at the corner of Avenida Abraham Lincoln and Calle Paseo de los Locutores. In that building, Samuel Pereyra, through Luis Ricardo Miñoso Rojas, financed a call center to promote his candidates. The call center was managed by the group associated with Liz Adriana Mieses Díaz and Giancarlo Aramis Vega Paulino.

Luis Marte, who previously promoted himself as a homosexual escort on the websites Chiviricas and SoyTuyo.com, was assigned to a mid-to-senior level post at REFIDOMSA upon Samuel Pereyra Rojas's arrival. He lacks the professional qualifications required for the position and functions as the right-hand operative of Luis Ricardo Miñoso Rojas.

Voluntariado Banreservas, directed by Pereyra's wife, Noelia García Mazara de Pereyra, functioned as another conduit for partisan outlays. Assistant Mary France Lulo Collado is connected to her brother, Michel Philippe Lulo Collado (Honorary Consul of Jordan and husband of President Abinader's sister Rita). Senior executive Fraysis Nicel Moronta Rivera links Noelia García, Massiel Suazo de Rojas, and Mary France.

Noelia García Mazara de Pereyra, wife of Samuel Pereyra Rojas and daughter of Ángel García Berroa (a former professor who later became a project developer), saw her personal fortune expand dramatically during her husband's tenure as president of Banco de Reservas through billion-dollar state financing for multiple Hotel Temptations projects in the emerging tourist area of Miches. President Abinader personally attended the inauguration to cut the ribbon. She has engaged in frequent international travel, including regular trips to Miami, and more recently was observed in Madrid in the company of attorney Carlos Sued, a lawyer who has been publicly linked to multiple controversial legal and commercial proceedings.

Public records and contemporaneous documentation indicate that a Bombardier Challenger aircraft was acquired on June 23, 2026 and immediately transferred to Sanal Global, Inc., a Delaware-registered entity whose ultimate beneficial owner is identified as Mr. Ángel García Berroa (father of Noelia García Mazara de Pereyra). Despite the formal registration in Mr. García Berroa's name, multiple independent sources—including contemporaneous video evidence circulated by journalist Carlos Rubio—have documented the same aircraft (and a second private aircraft, N73GP) being used by Samuel Pereyra Rojas himself and by individuals closely associated with the Dominican Presidency. The aircraft's operational pattern is inconsistent with the declared economic capacity of a public official and his immediate family under Dominican tax and anti-money-laundering legislation.

It is difficult to reconcile the lifestyle, travel patterns, and command of high-value assets (including the private jet registered through a Delaware shell company and the prior transfer of a hotel property belonging to Ángel García Berroa to an international management chain with a subsequent name change) with the lawful income and asset-declaration requirements applicable to ranking officeholders and their close relatives. These circumstances raise legitimate questions under both Dominican and U.S. frameworks governing unexplained wealth, beneficial ownership transparency, and the prevention of money laundering.

The Minister of Justice, Antoliano Peralta, also possesses substantial stakes in the same area. In 2022, President Abinader ordered the creation of a public art trust concretely to increase property values in Miches in support of his partisan allies and business partners, including the Grupo Puntacana controlled by the Rainieri family. The administration later awarded that same family a large portion of the major development project in Cabo Rojo, Pedernales. These actions confirm that the central priority of this governing coalition has been tourism capital venture in regions where both serving functionaries and their close partisan associates hold direct financial interests.

Under Pereyra's leadership, the bank approved high-risk tourism loans to government allies without adequate due diligence and bailed out failing firms using pandemic-relief assets. It also collected commissions on state transactions and facilitated operations involving Spanish officials during Pedro Sánchez's administration and associates of Maduro. Additionally, the bank secured media silence through publicity contracts and perks.

Since assuming a leading role at REFIDOMSA in August 2025, Pereyra has undertaken numerous contentious initiatives. Those identified to date include the following:
i. Partnered with his cousins Víctor José Rojas de Jesús and José Roberto Rosario Rojas on a fuel-distribution company that purchases fuel at low prices from REFIDOMSA and resells it at higher prices to partisan allies.
ii. Sharpened the electoral profile of Noelia García de Pereyra ahead of the 2028 elections.
iii. Disregarded transparency and procurement requirements under Laws 200-04 and 340-06.
iv. Retained convicted felon Miguel Vásquez Escoto on the board for over five years in violation of the term limits established in Article 36 of the company bylaws, while keeping his son César Miguel Vásquez Camacho in project roles in violation of the relative-benefit prohibitions set forth in Article 39 of the bylaws.
v. Diverted company resources through the Board of Directors and the REFIDOMSA Foundation to conduct proselytizing activities disguised as community support, thereby reinforcing the public image of the political figures he promotes, including Juan Garrigó Mejía, Carolina Mejía Gómez, Liz Adriana Mieses Díaz, and Giancarlo Vega Paulino, among others.
vi. Awarded the breast-cancer awareness project, without competitive bidding, to the wife of Luis Ricardo Miñoso Rojas.
vii. Sponsored activities wholly unrelated to the company's purpose, such as hiring comedian Juan Carlos Pichardo to perform a stand-up comedy show.

Pereyra has recently been linked to financial engineering operations originating from Mexico and the United States and is reportedly under scrutiny for sophisticated asset-concealment schemes affecting his closest associates. Although these and the preceding accusations are both grave and specific, the local Attorney General or District Attorney (Ministerio Público) has offered no public comment. Furthermore, the Ethics Direction (Dirección General de Ética) has buried all formal objections concerning REFIDOMSA and Banco de Reservas.

In September 2025, former Attorney General and Supreme Court Justice Miriam Germán Brito was designated as a member and Vice President of the Board of Directors of REFIDOMSA, where Samuel Pereyra Rojas serves as Chairman of the Board since August 2025. This designation took place while serious accusations of systemic graft, embezzlement, improper

procurement practices, and non-transparent ties to sanctioned Venezuelan entities continue to surround the management of the government-owned refinery.

Notably, Samuel Pereyra Rojas had previously been mentioned in connection with the Super Tucano aircraft procurement scandal, in which his uncle Senator Luis René Canaán Rojas was also implicated in accusations of bribery and overpricing. The designation of high-profile former justice officials to the board of an entity facing such serious accusations raises legitimate concerns about the effectiveness of scrutiny and integrity at REFIDOMSA.

The daughter-in-law of the current Minister of Justice, Antoliano Peralta Romero (wife of Antoliano Peralta Melo), was assigned to a post at Banreservas through Samuel Pereyra. Additionally, his other son, Alejandro Peralta Melo, maintains an advisor role at the Ministry of Energy and Mining.

The other side of Samuel Pereyra Rojas's family reveals the same practice of embedding relatives in state institutions. His uncle, Eddy Antonio Pereyra Ariza, has served as Press Officer at the Ministry of Energy and Mines while simultaneously drawing a state pension. His aunt Rosa Elvira Pereyra Ariza is listed as a sectoral specialist in the Human Resources Directorate of the Ministry of Industry and Commerce and, according to journalistic sources, functions as Medical Director. Another aunt, Ana Teresa Pereyra Ariza, appears on the retiree roster of the Universidad Autónoma de Santo Domingo, an autonomous public university sustained entirely by state funds.

An institutional link exists between Spanish businessman Dimas de Andrés Puyol and Dominican official Samuel Pereyra Rojas. It is grounded in the financial, speculation, and energy operations of companies controlled by De Andrés in the Dominican Republic, which engage directly with state entities that Pereyra directs or has directed.

As General Administrator of Banreservas, Pereyra controlled the Dominican State's primary financial institution for productive sectors and foreign investment. Companies associated with Dimas de Andrés obtained multimillion-dollar government concessions for photovoltaic energy projects valued at more than USD 300 million, with Banreservas routinely providing financing, guarantees, and transactional support.

Since August 2025, Pereyra has served as Chair of REFIDOMSA's Board of Administration and directs the State's hydrocarbons and energy supply strategy. At the same time, the business consortium linked to Dimas de Andrés has become a significant international investor in the Dominican energy matrix and industrial coprocessing, positioning both at the center of national energy infrastructure planning.

José Bono, former Spanish Minister, maintains a liaison with Juan Segovia. Segovia serves as President Luis Abinader's speechwriter and advisor and operates inside the president's inner nucleus. Executive Order 517-20, signed by Abinader himself just days after the August 2020 power transfer, granted Bono Dominican citizenship through privileged naturalization.

Bono registered companies in the Dominican Republic through ONAPI records in September and October 2020, immediately around the time of his citizenship grant. These include Teivelpir RD, Veleta Sociedad, Vetapir, and Tiseck Group. Reportings by ABC, El Debate, El Mundo, The Objective, and El Español have documented these firms in detail.

Bono partnered with Dimas de Andrés Puyol in Robiser Arrendamientos and secured involvement in two major solar projects, Pimentel Energy and Las Parras Energy. These projects received government concessions worth more than USD 400 million in combined investments. Several of the entities later relocated their legal addresses. The network sustains close

operational ties with ranking Dominican functionaries, including Pereyra at Banreservas and REFIDOMSA.

U.S. authorities are conducting an inquiry into José Bono for purported corrupt operations connected to these Dominican energy concessions and have not ruled out the possibility of filing criminal charges.

It would be worthwhile to look into the trips Samuel Pereyra has taken, both with and without Víctor Rojas. Particular attention should be given to those that are unrelated to the wedding in Mexico of Rita Lulo Abinader, daughter of Rita Sulina Abinader Corona and Michel Philippe Lulo Collado, and her fiancé Héctor Vogliotti Simental.

The reasons behind President Abinader's decision to replace Samuel Pereyra Rojas with Leonardo Aguilera Batista remain unclear. President Abinader fosters strong kinship with Leonardo Aguilera, and his sister Rita Abinader is connected through her sister-in-law, Mary France Lulo Collado, Samuel Pereyra's closest associate. This raises legitimate concerns that the exchange may have been intended, at least in part, to shield arguable conduct from proper inspection. Equally troubling is the persistent lack of transparency and the absence of effective scrutiny at REFIDOMSA, the country's sole national oil refinery, and at Banco de Reservas, the only state-owned commercial bank and the largest financial institution in the Dominican Republic by asset volume.

The more visible and less disciplined character of Samuel Pereyra's intimate group may have contributed to his removal from Banco de Reservas. Aguilera brought a background shaped by earlier connections to Soviet-aligned structures and academic experience in Ukraine. Pereyra presented a more conventional profile whose approach ultimately proved less effective at preserving the appearance of orderly institutional management.

Leonardo Aguilera did not assume full command of REFIDOMSA in a single move. He proceeded through measured steps until he had accumulated enough authority to pursue his broader objectives without internal opposition. Samuel Pereyra showed up with an already assembled scheme. He placed each associate in carefully chosen strategic posts that enabled him to forward his plans with little resistance.

REFIDOMSA urgently needs to streamline its operations and become efficient. A review of the financial statements since 2020 shows that the advertising budget has quintupled without rational justification, an especially striking increase for a vertical B2B enterprise. Salaries rose 49.3 percent during the same period, with no corresponding relationship to the improved returns that followed the post-COVID recovery in sales. Alongside these salary increases came disproportionate benefits granted to employees who add little or no value and do not contribute to the company's profitability.

The company's already thin margins are further eroded by excessive operating expenses. The cost of the annual Christmas celebration is now seven times higher. Travel and representation outlays doubled. Complementary compensation and overtime payments followed the same trajectory. Food costs rose 96 percent. Variable employee compensation multiplied by four. Similar anomalies appear across other line items and represent significant and ongoing leaks of state resources.

At the same time, REFIDOMSA requires substantial capital investment. The company needs to build a new terminal, expand maximum storage capacity for key fuels, and improve product quality in order to regain competitiveness within the sector.

REFIDOMSA could also move quickly toward meaningful innovation by shifting away from heavy crude oils toward fuels of growing demand, reducing sulfur compounds, and raising the octane rating of its derivatives. Projects such as the photovoltaic generation facility at the Nizao Terminal disperse resources that would be better concentrated on pragmatic and profitable objectives.

The obsolescence, declining market share, and physical deterioration of REFIDOMSA's facilities represent an issue that warrants urgent attention. As the country's only national oil refinery, with more than fifty years of operation, it has experienced a marked decline since it ceased to be managed by Shell plc. Major international energy companies such as Valero Energy, Marathon Petroleum, Phillips 66, Chevron, and ExxonMobil could find significant venture opportunities in the modernization and efficient operation of REFIDOMSA under a framework of honesty and sound governance.

Section III: Freedom of Speech and Government Accountability in the Dominican Republic

In the country, freedom of speech exists mostly on paper. Article 49 of the Constitution promises it without prior censorship. Yet the Abinader regime and its PRM majority have spent years methodically building tools to make the exercise of that right expensive, risky, or punishable. The approach follows a well-known model in which authority responds to disapproval by constraining speech rather than addressing underlying concerns. When criticism cuts too close to graft, mismanagement, or self-dealing, the response is not more transparency but legal tripwires and a massive expenditure of taxpayers' money aimed at directing the narrative. What critics accurately label as gag-law efforts encompass a sustained crusade of bills that treat reasonable public suspicion as defamation and citizen speech on social media as a threat to honor.

During the Abinader tenure, the PRM majority has sponsored multiple legislative initiatives that civil-society organizations, media outlets, and international press-freedom groups have characterized as carrying significant risks of restricting freedom of expression. In 2022 the Senate furthered a bill regulating the rights to intimacy, honor, good name, and image, which was widely denounced as a gag law (ley mordaza) for its potential to penalize the dissemination of information through traditional media and digital platforms.

Comparable proposals on cybersecurity included provisions for prison terms in cases involving the online circulation of certain audiovisual content. Reforms to establish and empower the Department of National Intelligence raised alarms over requirements that could compel disclosure of information and compromise journalistic source protection. Individual PRM legislators introduced additional measures targeting expressions deemed to incite hatred or addressing digital defamation.

President Abinader himself initiated a comprehensive "Ley Orgánica de Libertad de Expresión y Medios Audiovisuales" in 2022, intended to modernize the outdated framework, though the measure ultimately stalled and was archived in the Senate without approval. The most consequential development remains the incorporation of expanded provisions on defamation, extortion, libel, and slander into the new Criminal Code (Código Penal) through Law 74-25, promulgated in 2025 and scheduled to enter into force in August 2026. These articles extend criminal liability to public statements made via any medium, including cyberspace, and have been criticized for weakening traditional truth defenses while increasing penalties for content that affects the honor or image of public figures.

Parallel to these legal measures, the regime has directed large-scale state spending toward media influence and narrative management. Since September 2020 the central government has spent roughly 36.4 billion Dominican pesos on propaganda and governmental publicity. That is

an average of more than 6.4 billion Dominican pesos per year, with explosive spikes of over 500 percent in some quarters of 2024. Add the 'cariñitos' and direct aids and the combined figure exceeds 58 billion Dominican pesos. Contracts go to communication firms, media placement, and a mesh of communicators and influencers expected to amplify the official line. This is not neutral public information. It is narrative infrastructure that rewards friendly outlets and starves or marginalizes critical ones. The same nucleus that suddenly discovered the dangers of defamation on social media is the largest buyer of media space and messaging in the country. It forms a closed system of command.

The current flashpoint is the imminent entry into force of the new Criminal Code (Código Penal) amid pot-banging (cacerolazos) and street protests in Santo Domingo neighborhoods and beyond. Citizens and journalists correctly see the libel and slander expansions as criminalizing the everyday language of questioning, especially when aimed at power. The Chamber of Deputies, facing the heat, announced in early July 2026 a rushed process to tweak details before the law bites. This is an admission that the legislation is flawed and electorally toxic.

This entire architecture of legal coercion and narrative distortion connects directly to the Abinader and PRM record of malfeasance and intolerance of dissent. When entities face repeated accusations of corruption, dubious energy-sector dealings, and patronage, the rational response of a confident government would be to pierce the opacity with sunlight and wipe out the rot through genuine reform.

Instead, the answer has been an expanding toolkit of legal risk designed to taint and silence critics, paired with billions spent to co-opt media voices and manufacture an alternative reality. The mechanism unfolded most aggressively during the Biden years, when U.S.-Dominican relations stayed warm and USAID programs continued flowing into governance and civil-society channels with little external pressure on these domestic control efforts. The Trump administration's sharper skepticism toward foreign aid, including moves that effectively disrupted or downsized USAID operations, has coincided with louder domestic pushback and legislative scrambling. Whether by design or coincidence, the removal of certain external cushions appears to have raised the partisan price of these overt attempts to gag criticism at home.

Gratitude is extended to the Trump administration and to Secretary Rubio for their determined resistance to censorship, lawfare, gender ideologies, mass uncontrolled immigration, authoritarianism, and the growing dominance of China over Western democracies. These positions have reinforced the broader defense of open societies and accountable governance.

Section IV: The Architecture of Command – Chronopolitics and Institutional Capture under the Abinader Establishment

The exercise of authority by the Partido Revolucionario Moderno under President Luis Abinader cannot be read as ordinary governance. It is the outcome of a long, deliberate process of political capture that began years before 2020 and has since hardened into a practice: the systematic use of time itself as a tool of command.

That process took decisive form with the Marcha Verde movement that appeared in January 2017 after the Odebrecht revelations. What looked like a spontaneous civic reaction against graft was quickly structured and amplified by a dense constellation of civil-society groups, progressive media figures, and external partners. Participación Ciudadana, for years a major recipient of USAID funding, worked alongside Somos Pueblo, the Fundación Juan Bosch, and a circle of journalists and activists that included Huchi Lora, Altagracia Salazar, Marino Zapete, Edith Febles, Ricardo Nieves, Juan Bolívar Díaz, Carlos Pimentel, and others. They supplied organization, narrative framing, and ceaseless public pressure. At the same time, parallel

campaigns sought to internationalize the case against the Dominican Republic through thematic hearings before the Inter-American Commission on Human Rights, centering on Haitian migration and nationality questions. The external apparatuses that backed those efforts often placed priorities that sat uneasily with Dominican concerns over security and sovereignty.

Between 2017 and 2019, members of the same circle maintained regular contact with officials at the United States Embassy, framing their work in the language of rights and democratic improvement. Their most intense street mobilizations were timed to coincide with the 2020 municipal elections and the early COVID lockdown. When the PLD fell, the shift into government was rapid. Key figures from the earlier civic campaign moved into posts of real authority: Roberto Álvarez as Foreign Minister, Miriam Germán as Attorney General, Carlos Pimentel over public procurement, Juan Bolívar Díaz in the diplomatic service, along with a broader set of advisors, judges, and functionaries drawn from the same progressive milieu.

Once in office, the same actors who had insisted on urgency and transparency against the previous government reversed the temporal logic. An early state of emergency opened the door to procurement outside normal controls. Requests filed under the Law on Free Access to Public Information met repeated delays. Deportation measures that large parts of the population continued to demand against irregular Haitian migration were postponed. Fiscal reforms advanced through gradualism, always accompanied by promises of austerity that never fully materialized. Official statistics were selectively framed to project success at odds with everyday conditions. Projects of questionable necessity were stretched out to justify cost overruns, while others of high electoral visibility were rushed. Public debt was contracted under claims of urgency, including climate justifications whose actual scale stays open to question. In the Ministry of Education, curricular changes began to soften or reframe the historical account of the War of Independence against Haiti and the cultural distinctions that have long shaped Dominican identity.

Akin techniques of timing and pressure appeared in the internal handling of graft accusations. In July 2022, President Abinader received, in a closed meeting that included the current Minister of the Presidency José Ignacio Paliza, detailed evidence that then Minister of Education Roberto Fulcar, a close associate, had allegedly taken more than 200 million Dominican pesos in irregular payments from textbook publishers. The material reached the president through Senator Antonio Taveras and his operative Bartolomé Pujals. According to sources, while the president was urinating behind a makeshift curtain in his office, Paliza urged Pujals not to continue pressing on the wound.

Through Pujals, Taveras retained Jorge López Hilario and a crisis team to prepare formal complaints and legal actions against those involved in the textbook payments and against Fulcar himself. At the time, López Hilario was advising former Minister of Interior and Police Jesús "Chú" Vásquez and sat on the Equipo de Recuperación del Patrimonio Público, the body charged with recovering assets from earlier graft cases. That team was coordinated by Jorge Luis Polanco, who later resigned his official post to serve as defense counsel for Maribel and Antonio Espaillat López in the criminal case arising from the April 2025 collapse of the Jet Set nightclub, in which 236 people died as a result of their alleged gross negligence.

Pujals had already used comparable tactics, including the delivery of a shareholder resolution that altered the partners and board of the company Domicen to the Somos Pueblo movement, in an effort to force the removal of then Minister of the Presidency Lisandro Macarrulla amid accusations aimed at former President Danilo Medina and those around him.

Media pressure in both the Fulcar and Macarrulla episodes forced the president to replace the functionaries involved. In Fulcar's case the outcome was not blameworthiness but reward. He was named Minister without Portfolio, and his son Saúl Roberto Fulcar Soto was later appointed

as Consul General in New Orleans. The sequence is revealing: evidence of misconduct is managed through careful timing, selective amplification, and eventual rehabilitation of those who stay loyal.

Despite knowledge of the diversion of funds from SENASA, the public health-insurance administrator that covers the subsidized regime for the majority of the Dominican poor, the government delayed any serious judicial opening of the case against former director Santiago Hazim until after the 2024 elections. The plot ran from August 2020 to August 2025 through monopolized primary-care contracts, fictitious billing, falsified statements that hid deficits exceeding RD$14 billion, and roughly 30 percent kickbacks.

According to the Public Ministry and Listín Diario reporting, Eduardo Read Estrella and the Grupo Read companies alone received more than 7,110 million Dominican pesos from SENASA, of which approximately 1,621 million Dominican pesos were returned as bribes. The overall fraud has been quantified above 15,000 million Dominican pesos and later assessments place it beyond 19,000 million Dominican pesos. Funds taken from an institution charged with the health of the vulnerable were available for political deployment; the decision to contain the scandal until the electoral calendar permitted its release subordinated institutional integrity and the welfare of the poor to the preservation of power.

Similar inversion of priorities arises with particular clarity in the domain of public security. Ranking functionaries move with armed escorts, often including active-duty officers of the rank of colonel or higher. Ordinary citizens, by contrast, face increasingly restrictive rules on the legal possession and carrying of firearms. The result is a structural asymmetry: those who design and administer the security apparatus enjoy a level of personal protection that is systematically denied to the population they are charged with protecting.

This double standard rests on an idealistic premise that has proven costly. Prohibitions and bureaucratic barriers do not disarm the criminal. They disarm the law-abiding. When the police cannot guarantee immediate response, when prevention is weak, and when the ordinary institutional machinery is visibly overstretched, the citizen who respects the law is left exposed. The argument of legal protection becomes hollow the moment the law arrives too late or not at all. In such conditions, the ethical claim that the life of an ordinary productive citizen should carry equal weight to that of any officeholder is not rhetorical; it is a test of institutional seriousness.

The Abinader clique has moved consistently to tighten restrictions on legal civilian firearms while failing to dismantle the webs that supply weapons to criminal groups. Drug points operate with relative openness in multiple urban and peri-urban zones. Reports of weapons circulating between police elements and criminal actors persist. At the same time, the much-publicized reform of the National Police has absorbed significant budgetary resources into commissions, advisory posts, and administrative structures, many of them occupied by figures drawn from progressive and left-leaning rings whose practical contribution to operational capacity continues to be limited. Parallel reforms of the penitentiary system have been placed under the direction of Roberto Santana, whose previous tenure as rector of the Universidad Autónoma de Santo Domingo left a record marked by controversy and institutional decay.

The contrast with other models is instructive. Countries such as Switzerland, Austria, Norway, and Finland maintain both professional police forces and a genuine, regulated right of private defense. El Salvador's exceptional measures of mass detention and suspension of ordinary guarantees produced rapid reductions in homicide, but those measures were possible only because the ordinary institutional machinery had already collapsed. The Dominican Republic has neither the political will nor the operational capacity to replicate that approach, yet it

continues to restrict the defensive capacity of law-abiding citizens while the criminal remains armed. The asymmetry is not abstract. It produces measurable human cost every week.

In this field, as in others already examined, the governing coalition has inverted the temporal and institutional logic it once demanded. Urgency is declared when it expands bureaucratic structures or advances ideological reform packages. Delay and restriction are imposed when the issue is the practical capacity of ordinary citizens to protect themselves while the state still cannot. The security of high functionaries is treated as non-negotiable; the vulnerability of the productive population is treated as an acceptable residual risk.

A deeper layer of institutional capture is visible across the ministries and the National Congress. The Ministry of Public Administration, the Ministry of Women, the Ministry of Culture, the Ministry of Interior and Police, the Ministry of Youth, the Ministry of Education, the Ministry of Labor, and other state bodies show strong programmatic alignment with progressive frameworks driven by multilateral organizations: the United Nations Development Programme, European Union funding streams, the Inter-American Development Bank, the World Bank, the OECD, and a constellation of progressive NGOs. Policy templates, hiring criteria, official language, and reform packages often replicate models previously applied in Spain, Brazil, Mexico, and elsewhere. Training materials, gender and identity frameworks, and administrative designs originating outside the country are adopted with limited adjustment to Dominican institutional realities or popular priorities. The distance between the formal state apparatus and the historical, cultural, and security concerns of much of the population keeps widening.

This external programmatic influence runs parallel to an internal effort to shape the succession inside the Partido Revolucionario Moderno. The evident aim is to position Carolina Mejía and David Collado as the leading presidential options. Unlike 2024, when opposition forces were largely neutralized or brought into line behind a single candidacy, the present field shows clear fractures. Juan Garrigó Mejía is working to secure the party's general secretariat in order to tighten operational command over the base. Meanwhile, Leonardo Aguilera Batista, Elías Brache, Biviana Riveiro, Bartolomé Pujals, and the president himself have moved in ways that favor Collado's prospects.

Actors outside the governing coalition have so far failed to build any coherent or lasting counterforce. Their posture remains short-term and fragmented, leaving space for the continued expansion of the state. New ministries, including those proposed for Justice and Transportation, are being created even where their functions overlap with existing bodies, producing bureaucratic duplication and administrative disorder without a clear strategic direction.

What emerges is a coherent approach. A constellation that spent years constructing a narrative of crisis and moral urgency against former President Danilo Medina has, once installed, inverted the instruments of time: delay where accountability is required, acceleration where discretionary leverage or electoral advantage can be secured, and selective rewriting of both past and present to protect factional interests. Institutional redesign follows external templates rather than domestic deliberation. The effect is the steady subordination of institutional time and national priorities to the partisan calendar and ideological orientation of a narrow governing coalition, with direct consequences for transparency, sovereignty, and the trustworthiness of Dominican democratic institutions.

Supporting Documentation

A secure folder has been prepared on transfer.it containing documents, payroll records, contracts, internal financial reports, photographs, recordings, the Excel file referenced above, and other relevant materials. Please reply to this email to receive the access link and password.

Upon secure confirmation we are prepared to provide every contact or evidence available, and to brief relevant personnel from FBI, Treasury, State, and DOJ.

The use of shell companies, former PDVSA executives, and non-transparent structures to facilitate transactions originally involving sanctioned entities appears to violate OFAC measures under Executive Order 13850 (reinforced by the January 2025 designations against Maduro loyalists such as Peña Ramírez), the 2019 PDVSA sanctions, and FinCEN's AML/CFT framework.

We respectfully urge the Embassy and relevant U.S. agencies to investigate these matters thoroughly and to consider the designation of the individuals and entities involved under the appropriate OFAC sanctions programs and FinCEN advisories. Such measures would permit the freezing of assets, the imposition of secondary sanctions, and would convey a clear message that those engaged in senior graft, fraud, and misappropriation of state resources will face meaningful consequences.

This occasion is also taken to commend the resolute measures adopted by the administration in confronting the corrosive effects of narco-socialism across Latin America. Until recently, reversing the damage inflicted on the region appeared nearly impossible. It is trusted that the forces opposed to liberty and Western principles will not be permitted to reestablish themselves in academic institutions, cultural life, or among the rising generations of our peoples.

In the wider Caribbean and Latin American theater, this model has proven durable precisely because it operates beneath the threshold of conventional military or diplomatic confrontation. By embedding itself inside the energy and banking systems of partner nations, it secures hard currency, launders influence, and creates durable dependencies that are difficult to unwind once established. The Dominican Republic's unique position as a close U.S. partner and a critical energy and financial hub in the Caribbean makes the integrity of REFIDOMSA and Banco de Reservas a matter of direct national-security interest to the United States. Allowing these schemes to remain compromised by networks with documented linkages to sanctioned Venezuelan entities and Spanish commercial-political interests risks turning a strategic ally into an unwitting node in a regional structure designed to sustain and expand that regime's reach.

Thank you for your urgent attention to this topic of shared hemispheric concern. We stand ready at any time for further discussion or to furnish additional evidence.